

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

Bahia Amawi,	§	
<i>Plaintiff,</i>	§	
	§	
v.	§	Civil Action No. 1:18-CV-1091-RP
	§	
Pflugerville Independent School District; and	§	<i>consolidated with:</i>
Ken Paxton, in his official capacity as	§	
Attorney General of Texas,	§	Civil Action No. 1:18-CV-1100-RP
<i>Defendants.</i>	§	

**DEFENDANT KEN PAXTON'S NOTICE OF SUPPLEMENTAL AUTHORITY**

On January 23, 2019, a district court in the Eastern District of Arkansas denied a motion for preliminary injunction that sought to enjoin an anti-boycott Israel law much like the one at issue here. *See Exhibit A, Arkansas Times LP v. Waldrip et al.*, No. 4:18-cv-00914-BSM (E.D. Ark., Jan. 23, 2019). The district court concluded that a boycott of Israel, as defined by Arkansas' statute, is not protected by the First Amendment because it is not speech or inherently expressive conduct. *Id.* at 9–12.

The court noted that its conclusion “diverges from decisions recently reached by two other federal district courts.” *Id.* at 8 (citing *Jordahl v. Brnovich*, 336 F. Supp. 3d 1016 (D. Ariz. 2018) and *Koontz v. Watson*, 283 F. Supp. 3d 1007 (D. Kan. 2018)). For the reasons stated in General Paxton’s omnibus response (Doc. 25) and the reasoning recently provided by the district court in *Arkansas Times LP*, Plaintiffs’ motion for preliminary injunction should be denied.

Respectfully submitted.

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**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing document was served upon Plaintiffs' counsel of record through the Court's electronic filing system on January 24, 2019.

*/s/ Michael R. Abrams*  
MICHAEL R. ABRAMS